

# Submissions of the Green Party of Canada on the *Cannabis Act*To the Independent Expert Panel and the *Cannabis Act* Legislative Review Secretariat November 21, 2022

The Green Party of Canada is grateful for the opportunity to present our submissions on the *Cannabis Act* to the Independent Expert Panel and the *Cannabis Act* Legislative Review Secretariat. We thank the Expert Panel and Mr. Morris Rosenberg for their careful and assiduous attention to this issue.

# **INTRODUCTION:**

There is no doubt that the continued criminalization of cannabis was an improper use of resources in the context of the larger goal of reducing substance abuse. Furthermore, like many other criminal laws, the criminalization of marijuana was applied inequitably, particularly against Black Canadians, further entrenching the life-long and negative impacts of racism. As such, ending the ineffective and unjust criminalization of marijuana was a wise and necessary policy decision.

However, what was not clear several years ago was what the full impact of *legalization* would be. Legalization, the changing nature and potency of cannabis products, and the wide-scale production and distribution of marijuana are having a significant, unintended, and harmful impact on youth.

The Green Party of Canada's submissions focus primarily on protection of youth, as that is where society and government's greatest failure, as well as its greatest potential for impact, lie. In this context, we discuss the changing nature of cannabis, its impact on youth, its availability, and the steps that must be taken to protect those most vulnerable to the long-term negative effects of today's cannabis. Our submissions also address the risk of cannabis to young people in Indigenous communities and how we can protect small, lawful cannabis businesses, reduce excessive packaging, and make cannabis products more accessible to those with physical disabilities.

# **PART 1: RISK TO YOUTH**

#### *Not the same grass:*

Cannabis quality, potency, and variety has changed and is far more insidious

There is no debate that the marijuana available today is vastly different from the mild drug that was available in the 60s, 70s, and 80s. The THC content –THC being the psychoactive component of cannabis—in earlier strains of marijuana was around 2%, and rarely more than 5%. ¹ Currently, in Ontario, and for \$20-\$30, consumers can purchase cannabis oil in vape form with THC concentrations as high as 90%, with most options having between 70-85% THC.² Flower forms generally have a THC concentration of 20% or more.³ (See websites and pictures, attached.)

Admittedly, there are challenges in comparing marijuana test results from different decades. There are several reasons for this challenge. For example, the different methodologies used to measure THC throughout different decades yield results with varying accuracies. In addition, the quality of the plant, as well as its THC content, will vary depending on the source of the plants (which was most often not domestic prior to legalization), the fact that the entire plant, versus the bud only, were consumed in earlier decades, and how long the plant had been in transport or sitting in storage prior to being tested. Despite these limitations, there is no question that today's cannabis is produced and refined to yield much higher THC concentrations, and that the higher concentrations of THC can result in grave harm, particularly to youth.

In order to increase the accountability of dispensaries and to ensure that the quality of the cannabis used is known, producers of marijuana as well as retailers should be required to include their name and the concentration of various cannabinoid ingredients not only on the box, bag, or other container holding the cannabis, but also on the actual vape or dab pen. This measure will not only increase accountability, but, in those circumstances where youth are abusing cannabis (and throwing out the box), it will help parents, caregivers, and healthcare

<sup>&</sup>lt;sup>1</sup> Stuyt, Elizabeth. "The Problem with the Current High Potency THC Marijuana from the Perspective of an Addiction Psychiatrist." *Missouri Medicine*, Journal of the Missouri State Medical Association, 2018, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6312155/.

<sup>&</sup>lt;sup>2</sup> The Hunny Pot website: <a href="https://thehunnypot.com/2591-yonge-street-cannabis-menu/?dtche%5Bcategory%5D=vaporizers">https://thehunnypot.com/2591-yonge-street-cannabis-menu/?dtche%5Bcategory%5D=vaporizers</a>, and pages 15 ff

Canna Cabana website: https://cannacabana.com/collections/vape-cartridges

<sup>&</sup>lt;sup>3</sup> The Hunny Pot website: <a href="https://thehunnypot.com/2591-yonge-street-cannabis-menu/?dtche%5Bcategory%5D=flower">https://thehunnypot.com/2591-yonge-street-cannabis-menu/?dtche%5Bcategory%5D=flower</a>

Canna Cabana website: <a href="https://cannacabana.com/collections/weed-online">https://cannacabana.com/collections/weed-online</a>

<sup>&</sup>lt;sup>4</sup> LaFrance, Adrienne. "How Strong Is That Weed, Really?" *The Atlantic*, Atlantic Media Company, 6 Mar. 2015, <a href="https://www.theatlantic.com/technology/archive/2015/03/was-marijuana-really-less-potent-in-the-1960s/387010/">https://www.theatlantic.com/technology/archive/2015/03/was-marijuana-really-less-potent-in-the-1960s/387010/</a>

providers know how much cannabis and how much THC, specifically, is being consumed by the young person. This information is critical in providing harm reduction therapy.

# Recommendation 1:

1. All cannabis products, including "dab pens" and vaping devices, must include detailed labels on the product used (dab pens and other vaping devices) as well as on the packaging. This labeling should include the name of the growers and producers, the dispensary name (where feasible), as well as the THC concentration and strain of cannabis.

#### Impact of marijuana use on young people

High potency cannabis products come with significant cost to the physical, mental, developmental, and psychological health of young persons, whose brains continue to develop and mature until their mid to late 20s. Regular consumption of cannabis has significant, deleterious, and often long-term, impact on youth.

Long-term or heavy use of cannabis can lead to addiction (17% of adolescents develop an addiction, though this number may increase, given the wider availability and consumptions of cannabis with higher THC concentration), poor brain development, lowered IQ, learning and memory challenges, and symptoms of chronic bronchitis, among other ailments.<sup>5</sup> Specifically, the use of more *potent* drugs, which are currently the norm, increases the risk of addiction.<sup>6</sup> This means that, unless we take immediate steps to curb the availability and potency of marijuana consumed by youth, we may see higher numbers and rates of addiction among young persons in the coming years. Alarmingly, up to half of young patients who attend hospital emergency departments for hallucinations or other psychotic symptoms related to cannabis use go on to develop schizophrenia in adulthood.<sup>7</sup> A meta-analysis of 11 studies concluded that cannabis use in adolescents is associated with increased suicidality and depression later in life, even in the absence of premorbid conditions.<sup>8</sup> That regular and long-term cannabis consumption among adolescents leads to an increased likelihood of developing

<sup>&</sup>lt;sup>5</sup> Volkow, Nora D, et al. "Adverse Health Effects of Marijuana Use." *The New England Journal of Medicine*, U.S. National Library of Medicine, 5 June 2014, <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4827335/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4827335/</a>.

<sup>&</sup>lt;sup>6</sup> Freeman, T P, and A R Winstock. "Examining the Profile of High-Potency Cannabis and Its Association with Severity of Cannabis Dependence." *Psychological Medicine*, Cambridge University Press, Nov. 2015, <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4611354/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4611354/</a>

<sup>&</sup>lt;sup>7</sup>Crocker, Candice, et al. "When Cannabis Use Goes Wrong: Mental Health Effects of Cannabis Use That Present to Emergency Services." *Frontiers in Psychiatry*, 21 February 2021, https://www.frontiersin.org/articles/10.3389/fpsyt.2021.640222/full

<sup>&</sup>lt;sup>8</sup> Gobbi, Gabriella, et al. "Association of Cannabis Use in Adolescence and Risk of Depression, Anxiety, and Suicidality in Young Adulthood A Systematic Review and Meta-analysis." *Jama Psychiatry*, 13 February 2019. <a href="https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2723657">https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2723657</a>

psychosis in adulthood is also well established.<sup>9</sup> <sup>10</sup> <sup>11</sup> <sup>12</sup> These risks increase when those adolescents are struggling with depression, making regular cannabis use an even greater threat to young people and to society, given the increase of clinical depression among adolescents over the past 15 years.

Legalization has led to the broader availability of cannabis products, and may be resulting in an increased use of cannabis products with high levels of THC. It is incumbent on policymakers, governments, and educators to immediately step in and take action to address this crisis-in-themaking.

### How much cannabis are young people using?

We do not know *how much* cannabis adolescents are using. This gap in knowledge is due, in part, to the difficulty of obtaining an accurate and complete picture. The single, relatively comprehensive study on youth wellness conducted in Ontario is the Ontario Student Drug Use and Health Survey (OSDUHS), administered by the Centre for Addiction and Mental Health.<sup>13</sup> This voluntary and anonymous survey, which is administered biannually to Ontario students in grades 7-12, asks students to report on behaviours –such as alcohol and drug use, nicotine consumption, video gaming and gambling, and the quality of their relationships– that are linked to overall well-being. It is an extremely useful study.

However, there are limitations to what the study can tell us. For example, given the nature of the test (voluntary, self-administered), it is likely that students who are struggling the most with substance use and mental health may not be captured by the survey. Students suffering from significant depression, crippling anxiety, grave eating disorders, destructive addictions, and other serious mental health issues are likely to be absent from school and not following along with posted school information or announcements, and therefore not answering the survey.

<sup>&</sup>lt;sup>9</sup> Terrill, Aleta. "High-Potency Cannabis Use Associated with Higher Risk for Psychosis." *Psychiatry Advisor*, 17 Aug. 2022, <a href="https://www.psychiatryadvisor.com/home/topics/addiction/cannabis-use-disorder/high-potency-cannabis-use-associated-with-higher-risk-for-psychosis/">https://www.psychiatryadvisor.com/home/topics/addiction/cannabis-use-disorder/high-potency-cannabis-use-associated-with-higher-risk-for-psychosis/</a>

<sup>&</sup>lt;sup>10</sup> Yasgur, Batya Swift. "Cannabis-Induced Psychosis in Teenagers and Young Adults: Risk Factors, Detection, Management." *Psychiatry Advisor*, 5 July 2022,

https://www.psychiatryadvisor.com/home/topics/addiction/cannabis-use-disorder/cannabis-induced-psychosis-in-teenagers-and-young-adults-risk-factors-detection-management/

<sup>&</sup>quot;Is There a Link between Marijuana Use and Psychiatric Disorders?" National Institutes of Health, U.S. Department of Health and Human Services, 13 Apr. 2021, <a href="https://nida.nih.gov/publications/research-reports/marijuana/there-link-between-marijuana-use-psychiatric-disorders">https://nida.nih.gov/publications/research-reports/marijuana/there-link-between-marijuana-use-psychiatric-disorders</a>.

<sup>&</sup>lt;sup>12</sup> Radhakrishnan, Rajiv, et al. "Gone to Pot - a Review of the Association between Cannabis and Psychosis." *Frontiers in Psychiatry*, Frontiers Media S.A., 22 May 2014, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4033190/

<sup>&</sup>lt;sup>13</sup> "The Ontario Student Drug Use and Mental Health Survey (OSDUHS)." *CAMH*, <a href="https://www.camh.ca/en/science-and-research/institutes-and-centres/institute-for-mental-health-policy-research/ontario-student-drug-use-and-health-survey---osduhs">https://www.camh.ca/en/science-and-research/institutes-and-centres/institute-for-mental-health-policy-research/ontario-student-drug-use-and-health-survey---osduhs</a>

They are more likely to not have the energy to complete the survey, even if they do know about it. They may even be hospitalized and under care, and either unaware of the survey or uninterested in participating in it.

Furthermore, the latest study, conducted in the spring of 2021, was amidst the pandemic and at a time of school closures and uncertainty. At that time, many students were not even attending school, be it in person or online. Additionally, we have been advised by the OSDUHS team that the sample size in 2021 was smaller than usual, because of school closures, precluding the team from looking into details of drug consumption.

The 2021 study tells us that 17% of those who answered the survey reported cannabis use during the past year. <sup>14</sup> It tells us that 2.3% of the respondents report daily use. But given the limitations of the test questions, as well as the sample size in 2021, we do not have a helpful picture of the potency of weed used (though we know that, of the respondents, 17% reported using vapes, which tend to have the highest THC concentrations.)

That is why one of our recommendations is to ensure more comprehensive informationgathering as well as better labeling of cannabis products.

#### **Recommendation 2:**

2. The government of Canada should either conduct studies or fund studies to obtain a more comprehensive picture of cannabis and other drug use among youth across the country. The studies should seek answers with respect to frequency of use, amount consumed, the potency of drugs consumed, and the forms in which cannabis is consumed. These studies should be geared to students starting in Grade 7 (as opposed to Grade 9, which is the starting point for the CAMH study questions dealing with drug use.)

#### How easy is it to obtain cannabis?

Anecdotal evidence confirms that it is relatively easy for underage persons to obtain cannabis products, whether through dispensaries or through the street market. Some dispensaries do not ask for identification when young people enter to purchase products. As with alcohol, many young people use fake identification to make their purchases. At other times, younger people regularly rely on older siblings or friends for their products. Additionally, the wider availability of cannabis, combined with the widespread availability of cell phones to young persons, means that cannabis —whether from a legal or an illegal source— is simply a text, a Snapchat, or a hidden app away for most young persons. In fact, 41% of respondents to the CAMH study reported that cannabis is "fairly easy" to "very easy" to obtain.

<sup>&</sup>lt;sup>14</sup> idem

A critical step in reducing young people's access to marijuana would be to hold accountable those, be they individuals or businesses, who sell to underage persons. Young persons, friends of users, as well as some parents may be aware who these businesses or dealers who prey on young people are. Reporting these persons would be the first step to holding them accountable and reducing the availability of cannabis products to young persons. Governments can make it easier for concerned friends and family members to report unlawful sellers to authorities.

#### **Recommendation 3:**

3. Build and implement an effective reporting and investigative mechanism. One option is to have a hotline –a single number for anyone within each province– to anonymously report a dealer or seller who is known to sell to young persons.

## Advertising and Branding:

The law rightfully restricts packaging, branding, and advertising that is directed at or appeals to youth. **These restrictions must not be relaxed**. In fact, further enforcement is required to find and hold accountable those who do aim their advertising and branding to youth. Gummy and edible packaging is often colourful and resembles candies from the grocery aisle. Similarly, packaging for vapes and dab pens often targets young persons. We have also included pictures of a box from a cannabis product vape pen, called "Gas Gang," which included a vape pen in "Cotton Candy Kush" flavour. The colourful box of shades of pink, yellow, and blue, describes the product as such:

"Named for its soft, fluffy appearance and intense candied aroma, Cotton Candy Kush crosses lavender with Power Plant. The result is a pungent palate of sweet and berry flavors and floral scent. The euphoric effects will have you feeling like a kid in a candy store, while the relaxing powers will keep stress and pain to a minimum." <sup>15</sup>

Sounds rather like a Saturday morning children's programming commercial, or a treat sold at a summer fare. Similarly, posters with colourful lettering, catchy words and pictures of edibles can also be found around various neighbourhoods.

How often are young people exposed to advertising? The OSDUHS indicates that more than half of the students reported seeing cannabis advertising over the past month. Remember that this latest survey was conducted in the spring of 2021, when time spent outdoors was limited. This number will likely change, and is likely to increase, as students are now outside of the home more, and as the cannabis industry grows. The number is also likely to be different

 $<sup>^{15}</sup>$  See page 16

<sup>&</sup>lt;sup>16</sup> Boak, A., Elton-Marshall, T., & Hamilton, H. A. The well-being of Ontario students: Findings from the 2021 Ontario Student Drug Use and Health Survey (OSDUHS). Toronto, ON: Centre for Addiction and Mental Health 2022, page 10: <a href="https://www.camh.ca/-/media/files/pdf---osduhs/2021-osduhs-report-pdf.pdf">https://www.camh.ca/-/media/files/pdf---osduhs/2021-osduhs-report-pdf.pdf</a>

for those in larger cities versus smaller ones, and will vary for people in different neighbourhoods. In many Canadian urban settings and neighbourhoods, gummy and edible posters on residential streets were quite common for some time; cannabis stores, sandwich board signs, and storefront signs are readily visible at a rate of approximately one per block (more shortly after legalization); and even cartop advertisements have been spotted.

Advertising is not necessary as a means of letting adult users know that cannabis is available for sale; they already know that. Advertising is merely a tool for competition between various retailers and commercial growers, and as a means of drawing in new, young users who may become lifelong and loyal customers. The harm to youth, and the likelihood of an increase in use of cannabis by youth, far outweighs the only potential benefit of advertising, which is to increase brand loyalty and sales.

#### **Recommendations 4-7:**

- 4. Prohibitions against advertising and branding should in no way be relaxed. In fact, additional steps should be taken to further refine advertising rules, to limit the exposure of young persons to cannabis promotion.
- 5. Minimum restrictions on the proximity of cannabis stores and cannabis advertising near elementary and secondary schools should be federally set. The current requirement for stores in Ontario is 150 metres. This means that many students pass two or more cannabis stores on their way to and from school. The minimum standard should be increased to 250 metres or more, and limits should be set on how many stores can be within 500 metres of one another.
- 6. Retailers and sellers should not be permitted to display store signs (posters and sandwich boards, for example) advertising the variety of products sold. The use of images of edibles such as gummies, chewables, candies, chocolates, brownies, sparkling juices and other drinks should be explicitly prohibited.
- 7. A dedicated hotline, such as the one referred to in Recommendation 3, above, should be available for reporting violators, and enforcement should be swift, so that there can be more incentive for compliance.

#### Other recommendations relating to youth:

As indicated above, higher levels of THC pose greater risks to young users. Furthermore, adolescent brains continue to develop and mature until the mid to late 20s, and such development is significantly impacted by regular marijuana use. If the general age limit of 18 (19 in some provinces) for marijuana is to be maintained, then, a higher age limit should be set for products with a higher THC content and which pose additional long-term risks. One option would be to limit the sale of vapes or any products with a THC level above a certain limit (for example, 5%-10%), to people 25 years old and older. While this measure will not end the use

of cannabis products by young people, it sends a strong symbolic message and will make it more difficult for younger persons to obtain high THC products.

In addition, many older adult users appear to be unaware of the changes in cannabis products, compared to those used by them in their youth. These adults must be educated and made aware of how today's cannabis is different from the often romanticized 'Mary Jane" of the hippy generation, so that they are not tolerant or dismissive of marijuana use by their grandchildren or young persons.

Similarly, education and awareness must be increased for youth, to help reduce the number of young persons who turn to cannabis either recreationally or as a form of self-medication. These programs must be culturally sensitive and sufficiently varied to reach people of different ages, backgrounds, and cultures effectively. Such investment is key for Indigenous communities, where prevention, treatment, and harm reduction must take into consideration colonialism, racism, poverty, intergenerational trauma, and the unique forms of healing required for Indigenous peoples. And, as substance use will never be eliminated, it is vital to improve and increase mental health supports, as well as resources for addictions and therapy to help young users curb addictions and lead a healthy life.

#### **Recommendations 8-12:**

- 8. Examine options to reduce young adults' access to high potency THC. One option would be to increase to 25 the age limit for the lawful sale of cannabis products with THC levels above 10%;
- 9. Improve and increase adult education so that there is greater awareness of the difference between today's marijuana and that used by older generations;
- 10. Improve education directed at youth, to increase their understanding of marijuana, its impact, and the availability of support;
- 11. Invest in mental health supports, to increase preventative options so that young people do not use marijuana and other drugs to self-medicate;
- 12. Invest in a wide array of treatment options for young persons;
- 13. Ensure that prevention and treatment options for Indigenous persons are designed by Indigenous persons and respond to the unique experiences, culture, and history of Indigenous youth.

# PART 2: IMPACT OF LEGAL CANNABIS ON INDIGENOUS COMMUNITIES

We expect that the panel and the federal government have reached out directly to various Indigenous groups, businesses, communities, and leaders for their input on the *Cannabis Act*.

Our submissions with respect to cannabis and Indigenous communities have been developed through consultation with and have been approved by the Green Party of Canada's Indigenous People's Advisory Circle.

Our primary concern is with the risk that cannabis, like other substances, will become a pervasive, entrenched, and insidious coping mechanism for Indigenous youth or adults who continue to suffer harm from colonization, racism, poverty, and decades of disenfranchisement through forced removal from land, residential schools, violence against Indigenous women, and over-incarceration of Indigenous people.

#### **Recommendation 14:**

14. We urge federal and provincial governments to focus on providing the resources to Indigenous communities to continue to build necessary infrastructure, including clean water supplies, roads, and schools to support strong and self-governing communities; and to provide the support and funding for appropriate spiritual, cultural, and traditional practices that are required for healing, community, and for dealing with trauma, addictions, and other mental health and psychological struggles. Every step should be taken to avoid the abuse of cannabis by young Indigenous persons; the strengthening of educational, cultural, and traditional supports is one of the solutions.

# PART 3: PROTECTING SMALL, LAWFUL CANNABIS BUSINESSES:

# Strengthening the legal supply of cannabis:

Canada's legal cannabis market size is expected to almost double from 2022 to 2025.<sup>17</sup> However, a significant portion of cannabis users still access cannabis products from illegal sources. A 2022 study showed that 12% of adult cannabis users purchase exclusively from illegal sources, with 26% of users buying from both legal and illegal sources<sup>18</sup>. Price, convenience and quality were stated as the top three reasons for purchasing cannabis products from illegal sources.

While we may not be able to eliminate unlawful sources of marijuana, we must have a goal of reducing its reach. Illegal sources of cannabis place lawful and smaller businesses, who expend resources to ensure that they comply with safety and other regulations, at a disadvantage. They also pose a danger to young people and other users.

#### **Recommendation 15:**

15. Explore means of providing a greater advantage to lawful retailers. This may include, for example, reducing the pricing of provincial suppliers, such as the Ontario monopoly wholesaler Ontario Cannabis Store (OCS), to increase competitiveness of legal retailers compared with illegal suppliers.

#### **Protecting small cannabis retailers:**

The delay in conducting the Cannabis Act Review may be having an impact on legal cannabis retail stores, often small businesses already hard hit by the COVID-19 pandemic restrictions. Small cannabis retailers already have bureaucratic and economic barriers to success, including stringent store licensing and inspection requirements<sup>19</sup> and restricted access to traditional financing<sup>20</sup> and limited home delivery options.<sup>21</sup> Additionally, the nature of the industry results in significant structural barriers including, but not limited to, requiring ID checks, limits on

<sup>&</sup>lt;sup>17</sup> Prohibition Partners, The North American Cannabis Report: 3rd Edition, page 73: https://prohibitionpartners.com/reports/the-north-american-cannabis-report-3rd-edition/

<sup>&</sup>lt;sup>18</sup> Deloitte. 2021 Cannabis Consumer Report: Seeding new opportunities Listening to Canada's cannabis consumer, <a href="https://www2.deloitte.com/content/dam/Deloitte/ca/Documents/consumer-business/ca\_cannabis\_consumer\_survey\_en\_aoda.pdf">https://www2.deloitte.com/content/dam/Deloitte/ca/Documents/consumer-business/ca\_cannabis\_consumer\_survey\_en\_aoda.pdf</a>

<sup>&</sup>lt;sup>19</sup> Passifume, B. "Red tape, barriers keeping B.C.'s 'legacy' craft pot farmers out of legal marketplace Even after nearly four years of legalization, small growers say the government hasn't done enough to make the Cannabis market more accessible" Vancouver Sun, September 28, 2022: <a href="https://vancouversun.com/news/local-news/red-tape-keeping-bcs-legacy-craft-pot-farmers-out-of-legal-marketplace">https://vancouversun.com/news/local-news/red-tape-keeping-bcs-legacy-craft-pot-farmers-out-of-legal-marketplace</a>
<sup>20</sup> idem

<sup>&</sup>lt;sup>21</sup> Deschamps, T. "Marijuana was illegal 4 years ago. Now, Uber Eats delivers it in Toronto" CBC, October 16, 2022: <a href="https://www.cbc.ca/news/canada/toronto/uber-eats-cannabis-delivery-leafly-1.6618476">https://www.cbc.ca/news/canada/toronto/uber-eats-cannabis-delivery-leafly-1.6618476</a>

marketing and advertising as well as recruiting and retaining employees, many of whom are paid low wages with minimal job security.<sup>22</sup>

#### **Recommendations 16-18:**

- 16. Review store licensing and inspection requirements to ensure they are not unnecessarily onerous compared with alcohol or tobacco products;
- 17. Eliminate excessive barriers to financing legal cannabis retail stores;
- 18. Remove unnecessary barriers to home delivery of cannabis products, while ensuring compliance, the safety of young persons and the protection of the vulnerable.

<sup>&</sup>lt;sup>22</sup> Lamers, M. "Hundreds of cannabis store workers in Quebec go on strike" MJBizDaily, May 24, 2022: <a href="https://mjbizdaily.com/hundreds-of-cannabis-store-workers-in-quebec-go-on-strike/">https://mjbizdaily.com/hundreds-of-cannabis-store-workers-in-quebec-go-on-strike/</a>

# **PART 4: REDUCE EXCESSIVE PACKAGING:**

One third of the plastic waste generated in Canada every year is packaging. The cannabis industry is a contributor of this plastic waste as cannabis products are often packaged in multiple layers of plastic packaging. Cigarettes, on the other hand, are usually sold in a cardboard box with plastic wrapping and alcohol is also not subject to such excessive packaging. If Canada is to meet the zero plastic waste goal by 2030, this excessive packaging waste should be eliminated, while continuing to protect young people and the vulnerable.

#### **Recommendation 19:**

19. Review packaging requirements under the *Cannabis Act* and set standards to reduce excessive plastic product packaging, while ensuring that the safety of children and other vulnerable persons who may accidentally consume cannabis is protected.

Anecdotal evidence and reports suggest that excessive product packaging also has an unintended impact consumers of cannabis products living with disabilities or medical conditions (e.g. arthritis).<sup>23</sup> The child-safety mechanisms in current packaging may create a barrier to accessing the products that individuals need to live with their disability or medical conditions. This situation needs to be further examined so that appropriate solutions can be implemented.

#### **Recommendations 20-22:**

- 20. Examine whether and the extent to which packaging of cannabis products poses a barrier for persons with disabilities or medical conditions;
- 21. Where needed and to the extent that the safety of children is not compromised, allow for packaging mechanisms that are more suitable for those living with disabilities or medical conditions (such as arthritis) that make current packaging less accessible;
- 22. Increase education to adults on safe storage of cannabis products in households where children might access it.

<sup>&</sup>lt;sup>23</sup> MacDonald, Cheyenne. "Medical Marijuana Packaging Sucks If You're Disabled." *Input*, Input, 20 Apr. 2021, https://www.inverse.com/input/features/medical-marijuana-packaging-has-a-major-accessibility-problem

# **CONCLUSION:**

The long-term impact of legalization may be unknown for some years. We do have enough information and evidence, however, to raise deep concerns about the impact of this much-changed cannabis on youth. It is incumbent on governments to take immediate steps to limit the availability of cannabis products to youth, to step up enforcement against violators, and to provide support to youth and families seeking psychological and addiction support. We must ensure that Indigenous youth have the protection and strength of their communities, and that further harm, in the shape of cannabis addictions, does not infiltrate young Indigenous lives. Additionally, we need to improve legal access to marijuana, while decreasing illegal access, by strengthening the business environment for smaller cannabis retailers. Finally, we must create and implement solutions that make cannabis products more environmentally-conscious and more accessible to those who may not be able to use cannabis because of disabilities.

Submitted with gratitude,

**Dyanoosh Youssefi** 

Justice Critic, GPC Shadow Cabinet Signed also on behalf of:

**Karen Farley** 

Innovation Critic, GPC Shadow Cabinet

**Dr. Jennifer Purdy** 

Health Critic, GPC Shadow Cabinet

Valerie Powell

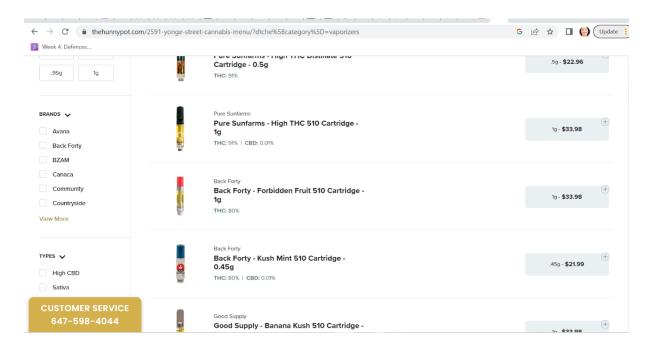
Seniors Critic, GPC Shadow Cabinet

Angela Davidson, Rainbow Eyez

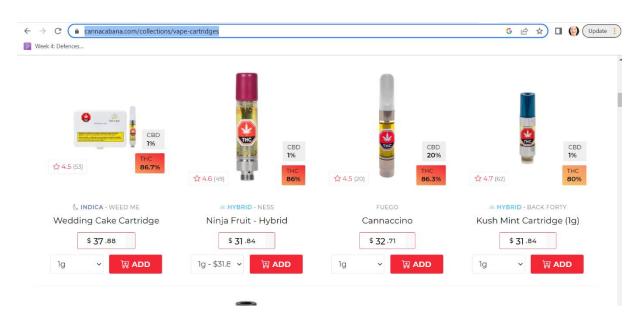
Deputy Leader, GPC

# **IMAGES**

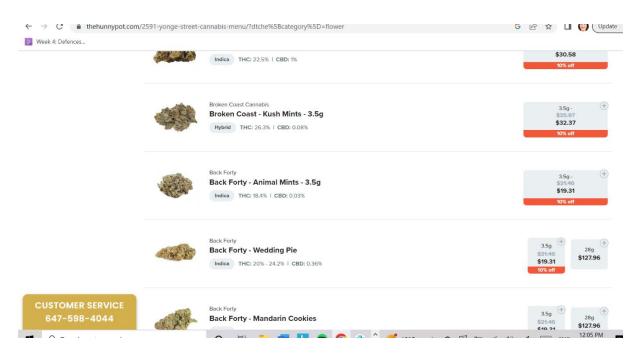
# The Hunny Pot- Cartridges:



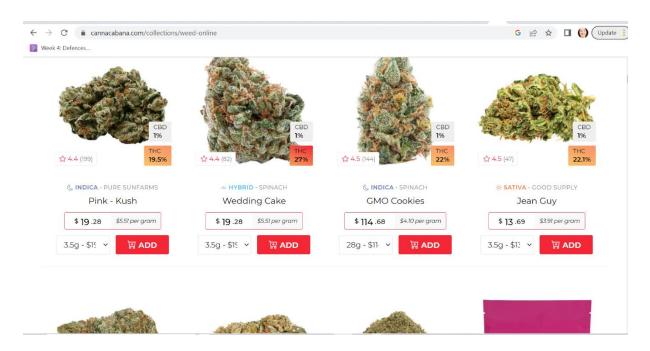
# Canna Cabana cartridges:



# **Hunny Pot Flowers**



# Canna Cabana Flowers:



# Cannabis vape box



